

From: [Tsiamis, Christos](#)
To: [Clarke, Kevin](#)
Cc: [Carr, Brian](#)
Subject: Request for additional documentation
Date: Thursday, October 08, 2015 12:03:34 PM

Kevin,

In addition to the **Preliminary Design Report (PDR) for location RH-4** that you recently informed that will be submitted by November 6, 2015, below I am listing additional information that EPA will need in order to complete the review of documents submitted by New York City. I am also listing documentation that EPA has requested but has not yet received as well as a request for some new documentation. Specifically:

A. Preliminary Design Report

The preliminary design report, which was submitted on June 30, 2015, did not include the following items that were required by the Order:

1. Site Assessments

i. Geotechnical field investigations and subsurface condition assessment

These investigations were not completed. Whereas, geotechnical information and assessments are described in Section 3.2.3, Geotechnical, in both RH-034 and OH-007 reports with additional information and reports in Appendix F of the RH-034 report and E of the OH-007 report, **both reports state that “A geotechnical investigation program will be required prior to design to characterize the subsurface conditions at the selected site(s).” The Order required the inclusion in the PDR of the geotechnical field investigations results and subsurface condition assessments described in the previous sentence.**

ii. Utilities (water, sewer, electric, gas, etc.) mapping;

Section 3.2.2.1, Subsurface Utilities, on page 3-3 of both the RH-034 and OH-007 reports state the following: “Available mapping of buried utilities including sewer, gas, power, telecommunications, and water were reviewed as part of the preliminary design process to identify a facility influent/effluent conduit alignment that minimized conflicts with existing utilities.” **However, there are no maps or descriptions of these utilities other than the sewers owned by the City and shown on figures and in the appendices of both reports such as Figure ES-2 on page ES-4 of the RH-034 report. No maps of drinking water, electrical, gas, telecommunications or other utilities are included in the reports as specified in the Order.**

2. Engineering

Hydraulic profiles that are typically provided in a schematic design that is required by the Order

are not included in the PDR. Hydraulic calculations for conveyance and design criteria are provided but **no hydraulic profiles are given for the tanks in the report.** The report indicates that they will be provided in the final design package – they are listed in the RH-034 Appendix F and OH-007 Appendix G anticipated drawing lists, but **the Order specifies that they be included.**

B. CSO Tank Siting Report

New York City should provide a revised CSO Tank Siting Report that incorporates EPA's May 7, 2015, comments. The comments require that New York City **revise the rankings of the site locations taking into account the considerations described in the comments.**

C. High Level Storm Sewer (HLSS) report with pilot studies

EPA has requested the submittal of the **revised HLSS design to include two pilot locations for a vortex oil/water separator system** at highly impacted areas along the route of the Carroll Street HLSS. As we have discussed, the revised design should also include a program for the evaluation of the pilot vortex systems and other methods that might be piloted simultaneously. That evaluation will incorporate the period of time over which the evaluations will be conducted, a methodology, and a sampling program at the discharge end of the HLSS concurrent with the evaluation of the pilots.

D. A response regarding the Lightstone vortex system

EPA's attorney, Brian Carr, has communicated to NYC attorney Chris King that the installation of the vortex system by Lightstone at the end of 1st Street should proceed and that NYCDEP should not prevent Lightstone from installing and connecting the equipment. As you and I discussed, this is in agreement with EPA's Record of Decision in preventing recontamination of the Canal from street ends and it is being piloted side by side with the adjacent 2nd Street Sponge Park project for which you have submitted design documents. EPA requests a response in writing that New York City will allow the project to proceed without further interference.

Finally, EPA requests **detailed documentation of the groundwater modeling** that was conducted by New York City at the top of the Canal in order to evaluate the effect of the cut-off wall that will be constructed by National Grid in accordance with New York State's remediation plan for the former Fulton MGP site. A slide or two of that modeling were included during the DEP Commissioner's recent presentations at EPA's office.

We look forward to receiving the above information at the earliest.

Sincerely,

Christos Tsiamis

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